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12 *signature pages*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: SOCIAL MEDIA ADOLESCENT
17 ADDICTION/PERSONAL INJURY PRODUCTS
18 LIABILITY LITIGATION

19 This Document Relates To:

20 *The School Board of Hillsborough County, Florida*
21 *v. Meta Platforms, Inc., et al.*, No. 24-cv-01573

22 *Board of Education of Jordan School District v.*
23 *Meta Platforms, Inc., et al.*, No. 24-cv-01377

24 *Tucson Unified School District v. Meta Platforms,*
25 *Inc., et al.*, No. 24-cv-01382

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Judge: Hon. Yvonne Gonzalez Rogers

**OMNIBUS SEALING
STIPULATION REGARDING
DEFENDANTS' MOTION TO
PRECLUDE PLAINTIFFS FROM
RELYING ON LATE-DISCLOSED
SCHOOL DISTRICT WITNESSES**

26 Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective
27 Order (ECF No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting
28 Sealing Procedures (ECF No. 341), Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.,
Facebook Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook
Technologies, LLC, Instagram, LLC, and Siculus, Inc.; TikTok Inc., ByteDance Inc., ByteDance
Ltd., TikTok Ltd., and TikTok LLC; Snap Inc.; and YouTube, LLC and Google LLC (each a

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OMNIBUS SEALING STIPULATION REGARDING DEFENDANTS' MOTION TO PRECLUDE PLAINTIFFS
FROM RELYING ON LATE-DISCLOSED SCHOOL DISTRICT WITNESSES

“Defendant,” and collectively the “Defendants”), and Plaintiffs (collectively the “Parties”) submit this Omnibus Sealing Stipulation in connection with the briefing on Defendants’ Motion to Preclude Plaintiffs from Relying on Late-Disclosed School District Witnesses (ECF Nos. 1951, 1952).

At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the that the following should remain sealed:

Filing	Description	Paragraphs to Be Sealed	Basis for Sealing
ECF No. 1952-9	Exhibit G to Defendants’ Motion	Page 3, Paragraph 3 Names of certain employees or former employees as indicated in the attached version of Exhibit G.	The filing contains the names and/or titles of current or former non-party Defendant employees. At this procedural posture, there are compelling reasons to seal those names. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1 (N.D. Cal. Apr. 27, 2012) (granting motion to seal “employee-identifying information” because “[e]mployees and former employees who are not parties to this litigation have privacy interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); <i>Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors LLC</i> , 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i> , 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont’l Cas. Co.</i> , 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing these names is also consistent with the approach this Court took in sealing names of Meta employees in the Personal Injury Plaintiffs’ Master Complaint. <i>See</i> ECF No. 189.
ECF No. 1952-9	Exhibit G to Defendants’ Motion	Pages 3-4, Paragraph 4 Names of certain employees or former employees as indicated in the attached version of Exhibit G.	
ECF No. 1952-9	Exhibit G to Defendants’ Motion	Page 4, Paragraph 5 Names of certain employees or former employees as indicated in the attached version of Exhibit G.	
ECF No. 1952-9	Exhibit G to Defendants’ Motion	Page 4, Paragraph 6 Names of certain employees or former employees as indicated in the attached version of Exhibit G.	

The Parties agree that the portions of Defendants’ Motion, Plaintiffs’ Opposition, Defendants’ Reply, and supporting documents not listed in the above chart may be unsealed.

Pursuant to this case's sealing procedures, the following are attached hereto: (i) a modified copy of the Exhibit G to Defendants' Motion to Preclude Plaintiffs from Relying on Late-Disclosed School District Witnesses, with the redactions agreed by the Parties listed above; (ii) a Proposed Order on the Parties' Omnibus Sealing Stipulation; and (iii) unredacted versions of the other filings that were provisionally sealed or redacted.

IT IS SO STIPULATED AND AGREED, through Counsel of Record.

Dated: June 20, 2025

Respectfully submitted,

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LOCAL RULE 5-1(i)(3) ATTESTATION

I, Joseph Sandoval-Bushur, hereby attest in accordance with Local Rule 5-1(i)(3) that each signatory has concurred in the filing of the document.

Dated: June 20, 2025

By: /s/ Joseph Sandoval-Bushur
Joseph Sandoval-Bushur, *pro hac vice*

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